

Message

---

**From:** Matson, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FB3077BA25BB436DB410CCE640A21897-JMATSON]  
**Sent:** 2/23/2016 4:59:34 PM  
**To:** Cohn, Matthew E. [mecohn@arnstein.com]  
**Subject:** RE: USG FOIA [IWOV-ACTIVE.FID1629688]

Thanks. No need on simplifying, that is easy enough since we can group the A/C responses.

---

**From:** Cohn, Matthew E. [mailto:mecohn@arnstein.com]  
**Sent:** Tuesday, February 23, 2016 10:48 AM  
**To:** Matson, John <matson.john@epa.gov>  
**Subject:** RE: USG FOIA [IWOV-ACTIVE.FID1629688]

John:

See the responses below.

1. Do you want EPA to provide you with the information USG has sent us in response to our 114 Requests? As you know, USG claimed CBI protection for some of the data you sent us, so it would necessarily complicate our response if you want those documents included in EPA's response.

No, we have all of that, so no need for duplication.

2. The scope of your request draws in documents that are between Dan and myself, and possibly other attorneys with the SIP folks. Do you want those to be included in the response-meaning that you would most likely be receiving a privilege log detailing those documents, or do you wish to narrow the scope of your request to remove those documents?

Yes, we do want these documents included within the scope of the request. However, I can work with you on any practical way to simplify the privilege logging, if there is a way to simplify it.

**Matthew E Cohn**

Attorney at Law  
[www.arnstein.com](http://www.arnstein.com)

**ARNSTEIN & LEHR LLP**

120 South Riverside Plaza  
Suite 1200  
Chicago, Illinois 60606-3910  
Phone: 312.876.7188 | Fax: 312.876.6239  
Mobile: 847.732.0850  
[mecohn@arnstein.com](mailto:mecohn@arnstein.com)



Web Site

Accomplished lawyers who understand your goals.

Offices in Illinois and Florida

---

**From:** Matson, John [<mailto:matson.john@epa.gov>]  
**Sent:** Tuesday, February 23, 2016 10:37 AM  
**To:** Cohn, Matthew E.  
**Subject:** USG FOIA

Matt-

Some more questions on your FOIA request, which could speed up EPA's response and lower EPA response costs your client would be responsible for.

1. Do you want EPA to provide you with the information USG has sent us in response to our 114 Requests? As you know, USG claimed CBI protection for some of the data you sent us, so it would necessarily complicate our response if you want those documents included in EPA's response.
2. The scope of your request draws in documents that are between Dan and myself, and possibly other attorneys with the SIP folks. Do you want those to be included in the response-meaning that you would most likely be receiving a privilege log detailing those documents, or do you wish to narrow the scope of your request to remove those documents?

Please advise.

Thanks.

John

**John C. Matson**  
Associate Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
Office of Regional Counsel  
77 W Jackson Blvd. (Mail Code: C-14J)  
Chicago, IL 60604  
T: 312-886-2243  
[Matson.john@epa.gov](mailto:Matson.john@epa.gov)

